

Deborah Lindroth

July 14, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

This letter is being sent because of the proposed FTC's Business Opportunity Rule (R411993), if passed, could potentially ruin my independent USANA Health Sciences business. The requirements currently written into the Rule would make my work far too difficult and potentially make it impossible for me to continue earning the much needed extra income I receive as a result of my efforts in working my business.

As I understand it, the Rule would require me to let potential business partners know whether lawsuits were taken against USANA and I must disclose this whether the company was found to be guilty or innocent of any wrong doing. I know of no other business where this is a requirement. I have been employed in the past by companies in other industries which were found guilty of wrong-doing in their dealings with clients and even employees and were not required to, nor did they voluntarily, share the information with any of us. If this ruling is passed as written, I would lose any potential business partners because they would believe USANA was guilty of wrong doing even if nothing was found to be wrong. People bring lawsuits against companies and individuals whether justified or not. Why would a potential USANA associate want to participate in a company who has lawsuits out against it?

It also appears that the Rule would require a seven day waiting period for anyone interested in becoming an independent USANA associate, again making it more difficult for me to work my business. This gives the new associate the feeling there may be something wrong with their decision to become a part of USANA. No other purchase requires a seven day waiting period – not even the purchase of a car or a home! The USANA sales kit is only \$49.95, or an electronic version can be purchased for \$19.95! USANA has a 100% money back guarantee for 30 days! All of this has been set up by the company to protect the new associate.

The Rule would also require a disclosure of personal information of current USANA associates to a prospective USANA associate. The Rule states the personal information of a minimum of 10 previously enrolled independent USANA associates who live closest to the prospective associate must be given to the prospective associate. This is a list I would have to request from the company to have sent to the prospective associate. Not only is it burdensome, but takes considerable time. Most importantly, as this new prospective associate considers their own business with USANA, they must give permission for their personal information to one day be available to a stranger. Why in a day when we are all working so hard to protect our privacy would this become a requirement? Not only does this requirement to share personal information create problems for my business, but the potential for other companies using this list to recruit away my customer base would be huge. The ruling states the company could provide a national master list to be updated periodically which would keep the individual USANA associate from having to tailor references to each perspective new associate. This statement alone shows this to be burdensome to the individual associate. I know of no other business who offers personal information of their customer

base to the public. Why would any potential USANA associate want to participate knowing their personal information is readily available to anyone for the asking.

I have been an independent USANA associate for 10 years. It has given us the extra income we have needed and allowed me to work from home to be available to my children. USANA and this industry has given me (and many many others like myself) what no other industry can offer – the opportunity to be home where I'm needed.

As a consumer, I appreciate the work the FTC does on my behalf. I just feel this ruling as it is written would create huge burdens for those of us working hard in this industry and am sure this is not your intention but would hope some less burdensome alternatives are considered.

Thank you for your time,

Deborah Lindroth
Independent USANA Associate